

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

|                           |                         |
|---------------------------|-------------------------|
| UNITED STATES OF AMERICA, |                         |
| Plaintiff,                | Case No.: 1:19-cr-103   |
| vs.                       | Honorable Janet T. Neff |
| JAMES VERNE RUSSELL,      |                         |
| Defendant.                |                         |

**MOTION FOR CONTINUANCE OF TRIAL DATE**

Defendant JAMES VERNE RUSSELL, by and through his attorney of record, Michael Sanft, Esq., hereby moves this Court to continue his trial date currently set for January 27, 2020, for a date no sooner than 90 days.

The reasons for this motion is as follows:

1. The Government presented a superseding indictment on January 7, 2020, adding numerous new charges to the original indictment.
2. Defense counsel met with the Government prior to the arraignment for the superseding indictment to review the new discovery in the matter. The new discovery and charges require defense counsel to consider forensic analysis of the devices, in addition to possible other investigation in order to properly prepare for trial.
3. In addition, as a result of the meeting between the parties, the Government will be considering a new offer to resolve this matter prior to trial.

4. Defendant has been fully apprised of this matter, and has signed a consent for adjournment for the same.

5. It is defense counsel's belief that a continuance is the best and most prudent course of action at this time.

6. This request is not sought for purposes of delay, but to allow sufficient time to prepare for Defendant's case, as the ends of justice would be served under 18 U.S.C. § 3161(h)(7)(A).

DATED this 13th day of January, 2020.

Respectfully Submitted:

A handwritten signature in black ink, consisting of a large, sweeping 'M' followed by a smaller, more intricate flourish.

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MICHAEL SANFT, ESQ.

*Attorney for Defendant James Russell*